

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

CELEBRATE VIRGINIA SOUTH HOLDING)	
COMPANY, LLC, <i>et al.</i> ,)	
)	
Plaintiff,)	
v.)	Civil Action No. 3:21-cv-00261-DJN
)	
CVAS PROPERTY MANAGEMENT, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR EXTENSION OF TIME
IN WHICH TO FILE RESPONSIVE PLEADINGS**

Defendants, by counsel, move the Court for an extension time within which to file responsive pleadings to the Complaint until and including June 9, 2021, on the ground that existing obligations of counsel for defendants renders it necessary to obtain such an extension. *Counsel for plaintiffs has authorized counsel for defendants to represent that plaintiffs do not object to the requested extension.* A brief accompanying this motion is not required because the time to respond to the Complaint has not expired.

CVAS PROPERTY MANAGEMENT, LLC
CELEBRATE VIRGINIA SOUTH, L.L.C.
CVAS 2, LLC
CVAS BOULEVARD, LLC
CVAS PARKWAY, LLC
SCH AT CELEBRATE VIRGINIA SOUTH, LLC
THE COLLECTION AT CELEBRATE VIRGINIA
SOUTH LLC
CVAS PROPERTIES, LLC
CVAS GROCERY, LLC
RAPPAHANNOCK QUARRY WEST, L.L.C.
CVA EXPO CENTER, LLC
CELEBRATE VIRGINIA SOUTH
OWNERS ASSOCIATION, INC.

By /s/ John K. Burke, Jr.
Of Counsel

John K. Burke, Jr. (VSB No. 16798)
J. K. BURKE LAW FIRM PLC
5600 Grove Avenue
Richmond, Virginia 23226
Telephone: (804) 835-5929
Facsimile: (804) 285-7779
John@BurkeLF.com

Thomas M. Wood, IV (*Pro hac vice* motion and application will be submitted)
NEUBERGER QUINN GIELEN RUBIN GIBBER P.A.
One South Street, 27th Floor
Baltimore, Maryland 21202
Telephone (410) 332-8523
Facsimile (410) 332-8564
tmw@nqgrg.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel:

Timothy C. Bass, Esq.
Greenberg Traurig, LLP
1750 Tysons Boulevard, Suite 1000
McLean, VA 22102

/s/ John K. Burke, Jr.